

FILED

March 15, 2022

UNITED STATES DISTRICT COURTCLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

for the

Western District of TexasBY: EP

DEPUTY

United States of America

v.


Case No. EP:22-M-00524-LS

Matthew Joseph Contreras*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 03/15/2022 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

Title 18 U.S.C. § 922(g)(9)

Unlawful Acts - A person convicted in court of assault family violence, misdemeanor charge on or about August 25, 2016 in El Paso, Texas did knowingly violate Title 18 United States Code, Section 922(g)(9) to ship or transport in interstate or foreign commerce, or possess in or affecting commerce, any firearm or ammunition; or to receive any firearm or ammunition which has been shipped or transported in interstate or foreign commerce. 

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.*Complainant's signature*Michael R. Burgess, Special Agent*Printed name and title*

- ☐ Sworn to before me and signed in my presence.
☒ Sworn to telephonically and signed electronically.

Date: 03/15/2022City and state: El Paso, Texas*Judge's signature*LEON SCHYDLOWER, U.S. Magistrate Judge*Printed name and title*Complaint sworn to telephonically on
March 15, 2022 at 04:51 PM and signed
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent ("SA") Michael R. Burgess, herein after "Affiant," being duly sworn do hereby depose and state:

1. Affiant is a SA with the Federal Bureau of Investigation ("FBI") assigned to the El Paso Division. Affiant has been employed with the FBI as an SA since March of 2019 and is currently assigned to a squad that investigates violent crimes. Affiant knows it is a violation of federal law for any person who has been convicted in any court of a misdemeanor crime of domestic violence, to ship or transport in interstate or foreign commerce, or possess in or affecting commerce, any firearm or ammunition; or to receive any firearm or ammunition which has been shipped or transported in interstate or foreign commerce as it is a violation of Title 18, United States Code, Section 922(g)(9). The statements contained in the Affidavit are based on the Affiant's experience, background as an SA, and information provided by other law enforcement officers ("Investigators").
2. The information contained herein is based upon Affiant's investigation as well as the information supplied by other Investigators. Your Affiant has not included all facts known concerning this matter but only facts necessary to set forth probable cause.
3. On March 14, 2022, El Paso Police Department (EPPD) Crimes Against Persons Detectives as well as Federal Bureau of Investigation Special Agents were notified of a possible kidnapping that occurred between Eastern El Paso and Otero County, New Mexico. An individual hereafter referred to as **Victim 1**, reported to law enforcement that she was the victim of a domestic assault involving a deadly weapon. Victim 1 stated beginning at approximately 2:00AM on March 14, 2022, she was assaulted by her boyfriend, **Matthew Joseph Contreras** (Contreras) at his residence in located at 14817 Ava Leigh Avenue, El Paso, Texas 79938 which is in the Western District of Texas. Victim 1 stated Contreras saw a text message on her phone from another male and believed Victim 1 was romantically involved with this individual. Contreras proceeded to grab and squeeze Victim 1's face and then strike Victim 1 multiple times in the face. Contreras then obtained a knife and held the knife to Victim 1's neck and hand, while asking Victim 1 to admit her infidelity with the unknown male. He also used the knife to cut some of Victim 1's hair. Contreras then took a handgun and held the weapon to Victim 1's head and put the weapon in Victim 1's mouth.
4. Contreras threw Victim 1 out of the bed and proceeded to kick and strike Victim 1 multiple times and at some point, Victim 1 lost consciousness. Following this Contreras began pouring bleach all over Victim 1. He then told Victim 1 to clean herself up, however while attempting to bathe, Contreras used a spray bottle to spray Victim 1 with more bleach. Victim 1 begged Contreras to stop which resulted in Contreras throwing more bleach on her. After cleaning herself Contreras seized Victim 1's cell phone and credit cards and told her she would not be talking to anyone anymore and she would be quitting her job.
5. Contreras had a meeting at the Otero County Detention Center at approximately 9:30AM on March 14, 2022 and told Victim 1 she would be coming with him. Contreras told her he wanted her by his side no matter what. Victim 1 stated she was in fear for her life and agreed to go with him. During the drive to the Otero County Detention Center in a black Lexus IS250, Contreras and Victim 1 were stopped by an El Paso Police Department Patrol Officer for speeding and

Contreras told Victim 1 not to say anything and, if asked about her injuries, to say she was in a fight the day before at work. During the drive Contreras had a loaded handgun in his waistband. After arriving at the Otero County Detention Center, which is located in the District of New Mexico, Contreras placed the handgun in the side of the driver's side door and exited the vehicle and proceeded to head inside. Victim 1 attempted to exit the vehicle to find help and upon seeing this, Contreras returned and told Victim 1 to get back in the vehicle and if she exited the vehicle again, he would take her home and assault her further. Victim 1 was eventually able to signal Detention Center employees and report the situation to law enforcement. Victim 1 notified law enforcement of the weapon and took the weapon from the driver's side door and placed it on the dash. Law enforcement then took control of the weapon, rendered it safe, and it is currently being held by the El Paso Police Department.

6. On March 14, 2022, Contreras was charged with violating Texas Penal Code 13150005, Aggravated Assault with a Deadly Weapon. Contreras was the subject of an arrest warrant issued on March 14, 2022, and subsequently arrested on March 15, 2022, by members of the El Paso Police Department and FBI El Paso Division. A Search Warrant executed by EPPD on Contreras' residence in El Paso, Texas resulted in the discovery of multiple rounds of ammunition to include Luger 9mm and Winchester 12GA shotgun ammunition, none of which was manufactured in the state of Texas.
7. There is reason to believe, and your Affiant does believe, there is probable cause that **Matthew Joseph Contreras**, being a person convicted in court of assault family violence, misdemeanor charge on or about August 25, 2016 in El Paso, Texas did knowingly violate Title 18 United States Code, Section 922(g)(9) to ship or transport in interstate or foreign commerce, or possess in or affecting commerce, any firearm or ammunition; or to receive any firearm or ammunition which has been shipped or transported in interstate or foreign commerce.



Special Agent Michael Burgess
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO ME ON MARCH 15, 2022.



LEON SCHYDLOWER
UNITED STATES MAGISTRATE JUDGE